

PUBLIC VERSION

**Confidential Business Information
Deleted from Single Brackets [] at pages 3 and 4**

November 12, 2001

Ms. Gloria Blue
Executive Secretary, TPSC
Office of the USTR
600 17th Street, N.W.
Washington, DC 20508

Re: Steel: Exclusion Request for Certain Double Submerged Arc Welded Carbon Line Pipe of 18" diameter in .750" wall thickness or greater, in X60 grade or greater

Dear Ms. Blue:

Pursuant to the Notice published in the Federal Register on October 26, 2001, Corus Group plc would like to request that certain Double Submerged Arc Welded Carbon Line Pipe beyond the range of the domestic producers be excluded from any increased duty, tariff-rate quota, or quantitative restriction that the President may impose under Section 203 (a) of the Trade Act. This submission contains Corus' business confidential information marked in single brackets on pages 3 and 4 of this letter relating to its commercial and financial information. It provides detailed information about Corus' commercial shipments and market expectations. Consequently, Corus hereby requests that this document be exempt from public inspection.

A. Commercial name and HTS Number under which the Product Enters the United States

Double Submerged Arc Welded Carbon Line Pipe of 18" diameter in .750" wall thickness or greater, in X60 grade or greater is classified under HTS number 7305.11.10.30.

B. Description of the Product

The line pipe for which Corus requests an exclusion is a double submerged arc welded carbon line pipe of 18" diameter in .750" wall thickness or greater, in X60 grade or greater.

Examples of this product are:

18" x 0.938" wall thickness API 5L X60- DSAW;

18" x 1.00" wall thickness API 5L X60- DSAW; and,

18" x 1.125" wall thickness API 5L X60- DSAW.

These products are made to API 5L specifications plus additional, more stringent, customer specifications. These sizes and grades of line pipe are almost exclusively used for deepwater subsea pipeline applications.

C. Basis for Requesting Exclusion

Corus is requesting exclusions for these wall thicknesses of 18" line pipe because no domestic producer is capable of making these sizes and grade of pipe. While U.S. mills can produce other sizes and grades of welded 18" line pipe, they are not capable of making it in these specific wall thicknesses for which exclusion is requested. Specifically, U.S. producers ERW/American Steel can produce a line pipe with an estimated wall thickness less than .625"; Stupp and US Steel Camphill can each produce a line pipe with maximum wall thickness estimated to be .500"; and, DSAW Napa can produce a line pipe with a maximum confirmed wall thickness of .750".

D. Producers of the Product

Besides Corus Tubes, UK, there are only three other producers of these sizes and grade of line pipe in the world. They are Nippon Steel (Japan); NKK (Japan); and Confab (Brazil).

E. Total U.S. Consumption

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1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
[100	100	250 ²	100	100	540 ³	990 ⁴	300	300	300

F. Total U.S. Production

None.

¹ [

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² [

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³ [

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⁴ [

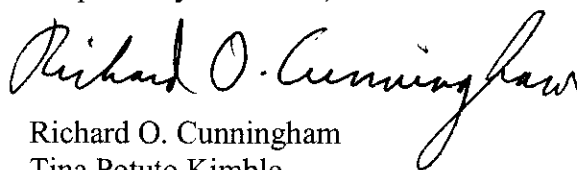
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G. U.S. Substitute

There are no U.S. substitutes for this product. [

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Respectfully submitted,

A handwritten signature in black ink, reading "Richard O. Cunningham". The signature is written in a cursive style with a large, stylized "R" and "C".

Richard O. Cunningham
Tina Potuto Kimble
Carlynnne S. Cockrum
Counsel for Corus Group plc